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Memorandum in
Support

MEMORANDUM

To: Robert McGuire
Associate Administrator For Hazardous Materials
Safety

From: ^{can 4/12} Charles Hochman
Director, Office of Hazardous Materials Technology

Subject: (Precedent Setting) Exemption Application #12706-N

Date: July 16, 2003

Enclosed is a precedent-setting draft exemption that is recommended for your signature. RAGASCO AS is a Norweigan manufacturer of non-DOT specification composite cylinders intended for the transportation of low pressure liquefied petroleum gas and other Division 2.1 materials. The cylinder is best described as a composite "barbeque" type cylinder.

The cylinder design is precedent setting for DOT because of the plastic-lined, fiberglass wrapped construction.

The cylinder is manufactured in accordance with the ISO 11119-3-2002 Standard and also meets most of the applicable DOT FRP-1 requirements. The proposed cylinders and RAGASCO have been approved in all EC countries. The RAGASCO cylinders are currently in use in Europe.

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